



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

June 9, 2023

BY E-MAIL

The Honorable Richard M. Berman
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *United States v. Prince Wareham*, 11 Cr. 912 (RMB)

Dear Judge Berman:

The Government writes to request an extension of the deadline to file its sentencing submission in the above-captioned case. The Government's submission presently is due on Monday, June 12, 2023. The Probation Office ("Probation"), however, is not scheduled to issue the final pre-sentence report ("PSR") until Friday, June 16, 2023. In the initial PSR, Probation raised an issue with the Guidelines calculation set forth in the plea agreement. The Government has objected to Probation's calculation. Before filing a sentencing submission, the Government would like to see (i) how Probation resolves the Guidelines issue and, (ii) Probation's sentencing recommendation. Accordingly, the Government requests a one-week extension, until June 19, 2023 to file its sentencing submission. Such an extension will give the Government time to review the final PSR before filing its submission.

Defense counsel consents to this extension, but does not consent to an adjournment of the sentencing date.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

By: 

Maggie Lynaugh
Assistant United States Attorney
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The Government's requested extension
is granted. The sentencing submission
will be due on June 19, 2023.

SO ORDERED:

Date: 6/9/2023


Richard M. Berman, U.S.D.J.